Remarks

I. Amendments

Claims 1 and 61-92 are pending. The claims are being amended in response to the outstanding claim objections. No new matter is added by these amendments, as the amendments are supported at least by paragraph 45 of the specification as published.

New claims 93 – 96 are being added. The claims are supported at least by paragraphs 29, 31, 33, 34, 37 and 45 of the specification as published.

II. Claim Objections

The Examiner suggests that the term "corresponding search result" in claims 1, 61, 71, 72 and 83 be amended to read "the corresponding search result document."

Claims 61, 72 and 83 are being amended to change the term "the corresponding search result" to "the corresponding search result document."

Claims 1, 71 and 82 are being amended to change the term "corresponding search result" to "search result." These terms in claims 1, 71 and 82 are intended to refer to a search result, and not the document that is referenced by the search result:

> generating in the search engine an instruction for each of the two or more search results that is configured to:
> cause the client device to display the query-relevant snippet of the search result on the client device; and
> navigate directly to the portion of the corresponding search result document when the corresponding active snippet link is selected by a user from the display of the query-relevant snippet of the search result on the client device

As amended, the "search result" is the search result that corresponds to the query-relevant snippet, i.e., the search result that is considered singularly and individually, as required by the "each of the two or more search results" language.

Withdrawal of the objection is requested.

III. Rejections Under 35 U.S.C. § 103

The examiner rejected claims 1, 61, 63, 70-72, 74, 81-83, 85 and 92 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Schneider (U.S. Pat. No. 6,895,430) in view of Cupps (U.S. Pat. No. 5,991,739) and further in view of O'Donnell, "Law in the Outer Limit." These rejections are traversed.

A. Claims 1, 71 and 82

The combination of Cupps, Schneider and O'Donnell does not teach the claimed instructions for each search result, nor the navigating directly to a portion of the search result document when the claimed active snippet link is selected.

With respect to claim 1, the Examiner correctly states that Schneider does not teach the claimed limitations of

> "to a top of a search result document; generating in the search engine an instruction for each of two or more search results that is configured to cause the client device....navigate directly to the portion of the corresponding search result document when the corresponding active snippet link is selected by a user from the display of the query-relevant snippet of the corresponding search result on the client device"

Office Action, pg. 7. The Examiner relies on the exemplary menu web pages 144 of Cupps and the HREF links of O'Donnell to fill this void. In particular, the Examiner relies on O'Donnell for teaching "navigating directly to a portion within a document and a document includes link to a top of the search result document," and on Cupps for the remainder of the above-referenced limitations that are missing from Schneider. The bases of the Examiner's rejections are provided on pages 7-9 of the Office Action.

i. Cupps

Cupps does not disclose the claimed instruction for each search result, nor the claimed generating of the claimed instructions. The claimed instructions cause a client device to navigate directly to the portion of the corresponding search result document when the corresponding

active snippet link is selected by a user from the display of the query-relevant snippet. The corresponding search result document, as claimed, is the search result document from which the query relevant snippet is extracted. In Cupps, however, there are no search result documents to reference because no such documents exist in Cupps. Cupps teaches that each of the menu web pages 144 is dynamically created in response to a customer request:

> The online ordering machine 106 generates menu web pages 144 that are specific to a particular customer's request. The creation of the menu web pages 144 is done dynamically at runtime in order to provide data that accommodates a customer's request. The creation of the menu web pages 144 in this manner differs from the prior art online order systems. In the prior art online order systems, the menu web pages are preconfigured and displayed upon request. This becomes a burden to maintain and limits scalability. In the present technology, each menu web page 144 is configured at runtime and customized for a particular customer's request. Thus, each menu web page 144 differs since each customer's request is different as is the customer's location.
>
> FIG. 7 illustrates the components used to dynamically generate a menu web page 144. A web page creation procedure 126 is provided that receives as input one or more customer requests and is linked to the order database 128 and the menu file system 146. The web page creation procedure 126 generates a menu web page 144 based on the input received from the user. The data included in the menu web page 144 is retrieved from the order database 128 and the menu file system 146. The order database 128 contains information such as the operational time of a vendor, the restaurant's logo, the categories of the food products served, and the like. The menu file system 146 includes menu data associated with each vendor. The menu file system 146 includes a number of menu files stored in an encoded binary format for faster retrieval purposes. The web page creation procedure 126 uses the data in the order database 128 and the menu file system 146 to dynamically generate one or more menu web pages 144 that are customized to a customer's request.

See Cupps, col. 8, ll. 43-55 (emphasis added). Thus, Cupps cannot disclose the claimed instruction in a search result that is configured to cause the client device to "navigate directly to the portion of the corresponding search result document" because Cupps discloses a system in which no corresponding search result document exists. There are simply no navigational instructions in Cupps, as there is nothing to navigate to.

On page 8 of the Office Action, the Examiner states that the relied upon portions of Cupps show "that as Enzo's is extracted from web page of fig. 8 to display to a user in another web page of Fig. 9 by a search engine after a user selection." The Examiner appears to argue that the "Enzo's" term is extracted from the page of Fig. 8 to display in the page of Fig. 9. This assertion, however, is inconsistent with the express teachings of Cupps cited above, i.e., data for each web page is extracted from an order database 128 and the web pages are built at run time. In summary, Cupps does not include any teaching of generating or including an instruction in a search result to navigate to *any* portion of a search result document – whether the top or a snippet – because there are no search result documents to reference.

ii. O'Donnell

O'Donnell does not remedy the shortcomings of Cupps and Schneider. O'Donnell only teaches basic HREF linking within a document. For example, the internal document link from the "The Facts" hyperlink to the "The Facts" heading is nothing more than a basic anchor link, as shown by the following HTML source of O'Donnell:

```
<A NAME=contents></A>
<H2>
 Contents
</H2>
<BLOCKQUOTE>
 <A HREF="#facts" >The Facts</A>
 <P>
 ...
</BLOCKQUOTE>
<P>
<A HREF="#bibliography" >Bibliography</A>
 <HR>
<H2>
 <A NAME="facts">The Facts</A>
</H2>
```

These HTML sources of O'Donnell are conventional HTML source instructions. However, the Examiner states that O'Donnell teaches "navigating directly to a portion within a

document and a document includes link to a top of the search result document." Office Action, page 9. The O'Donnell reference, however, is not a search result, and is not applied in any way as a search result document in the context of the claim language. Thus O'Donnell cannot teach the navigation portion of the claim, which is tied to the claimed instruction.

Furthermore, assuming O'Donnell is referenced by a search result, all of the navigational features of O'Donnell are within the document that constitutes O'Donnell. The claimed instructions for navigating directly to a portion within a search result document and for linking to a top of a search result document are included in the claimed search result, and not in the search result document.

In summary, O'Donnell does not include any teaching of a search result or instructions as to how the search result causes a client device to the portion of the search result document.

For at least these reasons, withdrawal of the rejection of claim 1, and all claims depending therefrom, is requested.

Independent claims 71 and 82 include limitations similar to those of claim 1. Thus, for the same reasons as set forth above, withdrawal of the rejection of claims 71 and 82, and all claims depending therefrom, is requested.

B. Claims 61, 72 and 83

The Examiner rejected claims 61, 72 and 83 on the grounds that Schneider, at col. 19, lines 45-67, and Fig. 6b, teaches the corresponding active snippet link includes an artificial anchor referencing the portion of the corresponding search result document containing the query-relevant snippet; and that the one-way bibliography link of O'Donnell teaches a corresponding search result document link that does not include an artificial anchor referencing any particular portion of the corresponding search result document.

As defined in the specification, an artificial anchor is an anchor that is undefined in the search result document. See paragraphs 12, 13, 30 and 31 of the published application. The artificial anchor can, for example, be appended to a link pointing to a target document. See, e.g., paragraphs 12, 31-36, and Fig. 5 of the published application.

i. Schneider

The relied upon portion of Schneider does not teach the active snippet link including an artificial anchor referencing the portion of the corresponding search result document containing the query-relevant snippet. These portions of Schneider, in full context, teach conventional search result links and additional links for search results that do not reference the claimed portion. The conventional search result links link only to search result pages and do not include any of the claimed artificial anchors, and the additional links link to other resources. This is readily apparent from Fig. 6c of Schneider, which is the HTML source of the page depicted in Fig. 6b. Both figures are reproduced below:

Results for "software patent"
1 - 4 next >>

1. SoftwarePatent.com : Software Patent Resources.
WHOIS
SoftwarePatent.com provides resources and links for: patent searching, laws, case, intellectual property organizations. All links are software, internet and computer patent related
99% 9/16/99 http://www.softwarepatent.com/

2. Software Patent Resource has moved to http://www.softwarepatent.com
WHOIS Homepage
Software Patent Resource has moved to http://www.softwarepatent.com
98% 9/15/99 http://www.longest.com/spn/spn.shtml

3. Patent Explorer / Software Subset
WHOIS Homepage Page Source
Rapid Patent, in association with Electronic Data Systems (EDS), has developed a single CD-ROM which holds all previously inaccessible software patent data. There are over 7,000 software patents covering 20 years from 1972. Full text searchable
98% 9/4/99 http://law.cd-rom-directory.com/cdprod1/cdhrec/002/509.shtml

4. Recent Software Patent Developments In The United States
WHOIS Homepage Page Source Meta Sitemap After Market Status
Recent Software Patent Developments In The United States John V. Swinson* Abstract This article examines recent U.S. developments in patent law concerning computer software. The cases discussed are appellate decisions of the Court of Appeals...
98% 9/24/99 http://www.comlaw.utas.edu.au/law/jlis/patents.html

Fig. 6b

```
<html><body>
Results for "software patent"<br>
1 - 4 next >><p>
<a href="http://www.softwarepatent.com">
1. SoftwarePatent.com : Software Patent Resources.</a><br>
<a href="http://www.networksolutions.com/cgi-bin/whois/whois?softwarepatent.com">
WHOIS</a><br>
SoftwarePatent.com provides resources and links for: patent searching, laws, case,<br>
intellectual property organizations. All links are software, internet and computer patent related<br>
99% 9/16/99 http://www.softwarepatent.com<p>
<a href="http://www.longest.com/spn/spn.shtml">
2. Software Patent Resource has moved to http://www.softwarepatent.com</a><br>
<a href="http://www.networksolutions.com/cgi-bin/whois/whois?longest.com">
WHOIS</a>   
<a href="http://www.longest.com">Homepage</a><br>
Software Patent Resource has moved to http://www.softwarepatent.com<br>
98% 9/15/99 http://www.longest.com/spn/spn.shtml<p>

et cetera....

</body></html>
```

Fig. 6c

For the first search result, there are two embedded links:

<a href="http://www.softwarepatent.com">

<a href="http:www.networksolutions.com/cgi-bin/whois?softwarepatent.com">

For the second search result, there are three embedded links:

<a href="http://www.longest.com/spn/spn.shtml">

<a href="http:www.networksolutions.com/cgi-bin/whois?longest.com">

<a href="http://www.longest.com">

None of these links teach the claimed active snippet link that includes an artificial anchor referencing the portion of the corresponding search result document containing the query-relevant snippet. Instead, the links are simply conventional URLs to particular web pages and a URL that generates a WHOIS query for a domain name.

For at least these reasons, withdrawal of the rejection of claims 61, 72 and 83 is requested.

ii. O'Donnell

O'Donnell does not teach a corresponding search result document link that does not include an artificial anchor referencing any particular portion of the corresponding search result document. First and foremost, as explained above, O'Donnell is a document, not the claimed search result.

Additionally, the Examiner states that the Bibliography link of O'Donnell does not contain any link to a portion of the document. The source of the bibliography link of O'Donnell is:

<A HREF="#bibliography" >Bibliography</A>

This links to a reference to the bibliography anchor at the end of the O'Donnell document:

<A NAME="bibliography">Bibliography</A>

The Examiner's interpretation of O'Donnell is inconsistent with the bibliography links that are explicitly defined in the document and reference particular portions within the document.

For at least these reasons, withdrawal of the rejection of claims 61, 72 and 83 is requested.

C. Claims 63, 74 and 85

The Examiner rejected claims 63, 74 and 85 over Schneider, Cupps and O'Donnell on the grounds that O'Donnell teaches:

> the query-relevant snippet further comprises one or more of the query terms; and

the instruction is configured to cause the client device to navigate directly to the portion of the corresponding search result document when the one or more query terms are selected by the user from the display of the query-relevant snippet.

In particular, the Examiner stated that the anchor references in the Contents table of O'Donnell teaches these limitations. Once again, these are anchors in a document, and are not the claimed instructions in the claimed search results. For at least these reasons, withdrawal of the rejection of claims 63, 74 and 85 is requested.

D. Claims 70, 81 and 92

The Examiner rejected claims 70, 81 and 92 over Schneider, Cupps and O'Donnell on the grounds that Cupps teaches:

each of the search results generated by the search engine comprises a plurality of query-relevant snippets extracted from the corresponding search result document by the search engine, each of the plurality of query-relevant snippets being associated with a corresponding active snippet link; and

the instruction for each of the two or more search results is configured to cause the client device to display each of the plurality of query-relevant snippets on the client device and to navigate directly to a portion of a respective one of the plurality of query-relevant snippets within the corresponding search result document when the respective active snippet link is selected by a user from a display of the corresponding search result on the client device.

As explained above, however, Cupps does not extract anything from search result documents, becausc in Cupps there exist no search result documents from which query relevant snippets can be extracted. The Examiner's rejection even notes that Cupps generates web pages dynamically, and that the user's requests are used to generate the web pages. Office Action, page 11.

For at least these reasons, withdrawal of the rejection of claims 70, 81 and 92 is requested.

E. Claims 62, 64, 73, 75, 84 and 86

The Examiner rejected claims 62, 64, 73, 75, 84 and 86 over Schneider, Cupps and O'Donnell, and further in view of Hennings (U.S. Pat. No. 6,763,496). These rejections are traversed.

i. Claims 62, 73, and 84

The Examiner states that the relied upon portions of Hennings teach "at least one of the search results further comprises a second corresponding active snippet link to a separate portion of the corresponding search result document containing a second query-relevant snippet" (claims 62 and 73)" and "at least one of the search results further comprises a second corresponding active snippet link to a separate portion of the corresponding search result document containing the query-relevant snippet" (claim 84).

The relied upon teachings of Hennings, however, only describes conventional HTML linking, and the described hyperlink is not a "query-relevant snippet, the query-relevant snippet being text extracted from the corresponding search result document." There is no teaching in Hennings as to how the hyperlinks are "query-relevant." Indeed, the hyperlinks are not query-relevant, as the hyperlinks would be the same each time the homepage 100 is loaded.

Additionally, Hennings does not disclose the claimed active snippet link to a separate portion of the search result document containing the query relevant snippet. The Examiner cites to the web page hierarchy of Fig. 2 of Hennings and col. 6, ll. 47-60. These teachings of Hennings, however, only describes common linking provided by HTML, and there is no teaching of the claimed active snippet link to a separate portion of the search result document containing the query relevant snippet. Instead, the only teaching of Hennings is that a webpage is provided in response to selecting a link on the homepage 100 or any subsequent page.

For at least these reasons, withdrawal of the rejection of claims 62, 73 and 84 is requested.

ii. Claims 64, 75 and 86

The Examiner states that the relied upon portions of Hennings teach "each instruction includes an intra-document link for the query-relevant snippet, each intra-document link pointing to the portion of the query-relevant snippet within the corresponding search result document."

The relied upon portions of Hennings do not teach an intra-document link pointing to the portion of the query-relevant snippet within the corresponding search result document. Again, there is no teaching in Hennings as to how the hyperlinks are "query-relevant." Also, Hennings only describes common linking; there is no teaching of an intra-document link pointing to the portion of the query-relevant snippet within the corresponding search result document.

For at least these reasons, withdrawal of the rejection of claims 62, 73 and 84 is requested.

IV. New Claims 93-95

New claims 93 – 95 recite limitations that are not disclosed by the art of record. In particular, for the reasons set forth above, the art of record does not disclose search results in which each search result includes the claimed active snippet link limitations of claim 95, nor the claimed intra-document links of claim 96.

For at least these reasons, claims 93 – 96 are allowable over the art of record.

V. Conclusion

The allowability of all of the pending claims has been addressed. The absence of a reply to a specific rejection, issue, or comment does not signify agreement with or concession of that rejection, issue, or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment or cancellation of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment or cancellation.

Please apply any other charges or credits to deposit account 06 1050.

Respectfully submitted,

Date: November 2, 2009

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